



STATE OF DELAWARE
PUBLIC SERVICE COMMISSION
861 SILVER LAKE BLVD.
CANNON BUILDING, SUITE 100
DOVER, DELAWARE 19904
TELEPHONE: (302) 736-7500

August 22, 2019

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Lindsay Orr, Esquire
Delmarva Power & Light Company
Mailstop 92DC42
PO Box 6066
Newark, DE 19714-6066

Re: IN THE MATTER OF THE FORMAL COMPLAINT OF GWENDOLYN SCOTT-JONES AGAINST DELMARVA POWER & LIGHT COMPANY REGARDING A DISPUTED AMOUNT ON ACCOUNT FOR ELECTRIC SERVICE DUE TO ALLEGEDLY THEFT OF SERVICE FOR THE PERIOD OF APRIL 1, 2014 THROUGH JULY 10, 2019 (FILED AUGUST 21, 2019)
PSC COMPLAINT DOCKET NO. 19-0530

Dear Ms. Orr:

On August 21, 2019, Ms. Gwendolyn Scott-Jones filed with the Delaware Public Service Commission a formal complaint against Delmarva Power & Light Company (“DP&L”) under §2.3 of the Commission’s Rules of Practice and Procedure (26 DE Admin. Code. §1001-2.3). The complaint has been docketed as PSC Complaint Docket No. 19-0530.

Pursuant to §2.3.2 of the Commission’s Rules of Practice and Procedure, I am, with this letter, formally serving you with a copy of this complaint. Under §§2.3.2 and 2.4.1 of those Rules of Practice and Procedure, DP&L is required to file an Answer to the complaint with the Commission within twenty (20) days after service of the complaint. DP&L must serve a copy of that Answer on the complainant and also serve an additional copy upon the Division of the Public Advocate. The submitted Answer should conform to the requirements of §§1.6, 1.7, and 2.4 of those Rules of Practice and Procedure. Please consult those Rules (26 DE Admin. Code 1001) for additional requirements that may be applicable.

Ms. Lindsay Orr, Esquire

August 22, 2019

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The service of this complaint and the directive for an Answer does not reflect any decision by the Commission on the merits of the complaint.

If the complainant and the respondent reach an agreement resolving this complaint, the parties should then file the statement required by §2.5.1 of the Commission's Rules of Practice and Procedure.

Pursuant to §1.6.5 of the procedural rules and 29 *Del. C.* §8716(e), I have also caused a copy of this formal complaint to be forwarded to the Division of the Public Advocate.

Finally, pursuant to 26 *Del. C.* §114(b) (1), DP&L is hereby placed on notice that the costs of this proceeding shall be charged to it.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Donna Nickerson".

Donna Nickerson
Secretary

Enclosures (copy of Complaint)

Certified Mail Certificate #70123460000111187587

cc: PSC Complaint Docket No. 19-0530
Regina Iorii, Esquire, Div. of the Public Advocate (w/encl)
Andrew Slater, Public Advocate (w/encl)
Members of the Commission (w/encl)
Matthew Hartigan (w/encl)
Samantha Hemphill (w/encl)
Gwendolyn Scott-Jones (Complainant)

Formal Complaint for DPUC

I. Name, mail and e-mail addresses, daytime telephone and fax numbers of the complainant;

Gwendolyn Scott-Jones
129 East Street
Harrington, Delaware 19952
gscottjones@desu.edu
302-331-6105 (Cell)
302-857-6664 (Work)
302-857-6661 (Work Fax)

II. Name of the person that is subject of the complaint;

Delmarva Power

III. Description of conduct, including all known facts, alleged to have violated a law, rule or order; and

See Consumer Protection Complaint Attached.

IV. Description of the relief requested.

The complainant does not feel that she is responsible for the \$19,396.94 bill generated by Delmarva Power and the relief would be for the \$19,396.94 to be removed from the complainant's account.

NOTE: Delmarva Power is expecting payment by August 28, 2019.

V. Formal complaints alleging violations of any matter within the Commission's jurisdiction shall be served by the Secretary either through DelaFile or by certified mail on the person that is the subject of the complaint and direct such person to file a response within twenty (20) days of the service, unless emergency relief is requested and appropriate.

This information must be submitted through DelaFile.



CONSUMER COMPLAINT STATEMENT (Declaración de Querella de Consumidor)

Delaware Department of Justice
Consumer Protection Unit
820 N. French Street, 5th Floor
Wilmington, DE 19801
Phone (Teléfono): (302) 577-8600 or (800) 220-5424
Email (Correo Electrónico): consumer.protection@delaware.gov

For Official Use (Para Uso Oficial)

Case No. (Num de Caso):	
Intake Specialist (Especialista de Ingesta):	

Submitted By (Presentada Por)

Your Name (Su Nombre):	Gwendolyn Scott-Jones		
Street Address (Su Dirección):	129 East Street		
City (Ciudad):	Harrington	State (Estado):	DE
		ZIP Code (Código Postal):	19952
Telephone (Teléfono):	302-331-6105	Email (Correo Electrónico):	gscottjones@desu.edu

Person or Business the Complaint is Against (Persona o Empresa la Querella es en Contra de)

Name (El Nombre):	Delmarva Power		
Street Address (La Dirección):	84CP44, 5 Collins Drive		
City (Ciudad):	Carneys Point	State (Estado):	NJ
		ZIP Code (Código Postal):	08069-3628
Telephone (Teléfono):	1-800-375-7117	Email (Correo Electrónico):	

Narrative Statement (Declaración Narrativa)

Please PRINT or TYPE your complaint in FULL detail. Add additional sheets if necessary.
(Favor de escribir su querella a máquina o en letra de molde. Agregue más páginas si es necesario.)

Hello,
My name is Gwendolyn Scott-Jones and I reside at 129 East Street in Harrington, Delaware. I have been at this residence for approximately 21-years and Delmarva Power have been providing electric to this address. Approximately 30-days ago, my neighbor Frank Coverdale called me to apprise me that a representative named, Jeff was at my home and he left his number (e.g., 302-420-9948) for me to call him regarding damage to my electric meter box. I called Jeff and he reported to me that my meter box was tampered with and that I would need another meter box. He stated that the box been altered for awhile. At this juncture, I had no idea what Jeff was referring to because I am not an electrician and I had never tampered with my electric meter box. This was very perplexing to me, because I could not remember the last person who may have serviced my electric. I asked my husband and he could not recall having anyone over recently to service our electric. Jeff told me that I needed a master electrician out to my home to change the meter box and I hired a master electrician (i.e., Mr. Marvin Paker), who communicated directly with Delmarva Power to make the repairs. In addition, Delmarva Power was present when he made the repairs to the meter box.

Subsequent to Jeff notifying me via telephone that my electric meter was tampered with, I received a non-certified letter from Delmarva Power stating that they suspected that my electric was tampered with and that they could choose to take me to court. I discarded this letter, because I had already hired the master electrician and thought that after the repairs was made that I would not incur any further sanctionss from Delmarva Power. On or around August 10, 2019, Delmarva Power sent me a non-certified letter stating that the Revenue Protection Investigator found that the electric meter had been tampered with. Delmarva Power adjusted my electric account (#055003446089) to debit \$19,396.94 from me (i.e., see document attached). The \$19,396.94 is suppose to be for stolen electric from April 1, 2014 to July 10, 2019. I do not know why Delmarva Power took this long to discover that there was a problem with my meter box.

The aforementioned charges are utterly ridiculous and I did not steal any electric or tamper with the electric meter at 129 East Street in Harrington, Delaware. I find that Delmarva Power has accused me of tampering with my electric meter and stealing electric without having the burden of proof. Therefore, they have whimsically adjusted my account to debit an unreasonable amount of monies owed without proving that I did something to alter the electric. I feel victimized, because there is no way that someone under that I can make monthly electric payments to include the \$19,396.94 even if they offered me payment arrangements. Currently, I am under Chapter 13 Bankruptcy and my lawyer is Mr. William Jaworski, Esq.

I am looking for assistance with this matter, because I fear that Delmarva Power will cut my electric off in the near future because the \$19,396.94 is reflected on my account as outstanding. Please help me, because this will pose a tremendous hardship on me and my family. I may be subject to leave my home, if I do not have electric.

Sincerely,

Gwendolyn Scott-Jones

Questionnaire (Cuestionario)	
1. Have you filed a complaint with the Better Business Bureau? (<i>¿Ha formulado usted una querella con el Better Business Bureau?</i>)	<input type="radio"/> Yes (Sí) <input checked="" type="radio"/> No
<ul style="list-style-type: none"> If yes, identify when and how you did so, and attach a copy of your complaint if available. (<i>Si su respuesta es Sí, identifique cuándo y cómo lo hizo, y adjunte una copia de su querella si está disponible.</i>) 	
2. Do you grant the Consumer Protection Unit permission to send this complaint to another government agency should our review determine that such a referral is proper? (<i>¿Usted concede a la Unida de Protección al Consumidor el permiso para enviar esta querella a otra agencia gubernamental si determinamos que es apropiado después de revisarla?</i>)	<input checked="" type="radio"/> Yes (Sí) <input type="radio"/> No
3. Have you reported this complaint to any other government agency or to the police? (<i>¿Ha reportado esta querella a alguna otra agencia gubernamental o a la policía?</i>)	<input type="radio"/> Yes (Sí) <input checked="" type="radio"/> No
<ul style="list-style-type: none"> If yes, identify which government agencies or police and when and how you contacted them: (<i>Si su respuesta es Sí, identifique cuales agencias gubernamentales o de policía y cuándo y cómo los contactó:</i>) 	
4. Are you involved in a lawsuit or other legal action with the person or business this complaint is about? (<i>¿Ha usted iniciado una litigación u otra acción legal contra la persona o empresa en relación a esta querella?</i>)	<input type="radio"/> Yes (Sí) <input checked="" type="radio"/> No
<ul style="list-style-type: none"> If yes, identify the lawsuit or other legal action, including court name and case number. Attach a copy of the complaint or other document initiating the lawsuit or other legal action. (<i>Si su respuesta es Sí, identifique la litigación u otra acción legal, incluyendo el nombre de la corte y el número del caso. Adjunte una copia de la querella u otro documento comenzando la litigación u otra acción legal.</i>) 	
5. Does your complaint involve a home mortgage, contract for deed, or other form of home purchase financing? (<i>¿Su querella supone una hipoteca de casa, escritura de contrato, u otra forma de financiamiento de compra de casa?</i>)	<input type="radio"/> Yes (Sí) <input checked="" type="radio"/> No
<ul style="list-style-type: none"> If yes, identify the loan number or the account number here, and also complete, sign, and submit the Housing and Mortgage Disclosure Authorization form available on the Consumer Protection Unit's webpage (<i>Si su respuesta es sí, identifique el número de préstamo o de cuenta, y también complete, firme y envíe el formulario de Autorización de Divulgación de Vivienda e Hipoteca disponible en la página web de la Unidad de Protección al Consumidor:</i>) 	
6. What result do you hope to get as a result of this complaint? (<i>¿Qué resultado desea usted obtener de esta querella?</i>)	
<p>I hope that your agency can get Delmarva Power to take away the \$19,396.94 that they whimsically billed me. More specifically, please help me solve this problem and keep Delmarva Power from conducting this kind of informal business with other consumers.</p>	

Attach COPIES, not originals, of all papers that relate to this complaint, including any advertisements, contracts, receipts, bills, cancelled checks, written agreements, letters or emails.
 (*Envíe copias, no originales, de todos los documentos en relación a esta querella, incluyendo anuncios, contratos, facturas, recibos, cheques cancelados, acuerdos por escrito, cartas o correos electrónicos.*)

**PLEASE READ AND SIGN THE NEXT PAGE
 (POR FAVOR LEA Y FIRME LA PÁGINA SIGUIENTE)**

READ AND CERTIFY BEFORE SIGNING (FAVOR DE LEER Y CERTIFICAR ANTES DE FIRMAR):

I have attached copies of all papers that relate to this complaint. *(He adjuntado copias de todos los documentos relacionado a esta querella.)*

☒ Yes (Sí)
☐ No

I understand that in order to handle this complaint successfully the Consumer Protection Unit may need to send it to the person or business I have complained about. *(Entiendo que para poder resolver esta querella exitosamente, la Unida de Protección al Consumidor necesita enviar la misma a la persona o empresa por cual yo he formulado cargos).*

☒ Yes (Sí)
☐ No

YOU MUST CHECK ONE OF THE FOLLOWING (FAVOR DE INDICAR UNA DE LAS SIGUIENTES):

- ☒ You have my permission to send this complaint, or otherwise share, release, discuss, or provide information regarding this complaint, to the person or business I have complained about.
(Usted tiene mi permiso para enviar esta querella, o de otra manera compartir, divulgar, discutir o proporcionar información con respecto a esta querella, a la persona o empresa por la cual yo he formulado esta demanda.)
- ☐ You DO NOT have my permission to send this complaint, or otherwise share, release, discuss, or provide information regarding this complaint, to the person or business I have complained about.
(Usted NO TIENE mi permiso para enviar esta querella, o de otra manera compartir, divulgar, discutir o proporcionar información con respecto a esta querella, a la persona o empresa por la cual yo he formulado esta demanda.)

The information contained in this complaint is true to the best of my knowledge, information, and belief. *(La información incluida en esta querella es correcta según mi mejor conocimiento, información, y creencia.)*

☒ Yes (Sí)
☐ No


Signature (*Firma*)

8-13-19

Date (*Fecha*)



Your electric bill - Jul 2019

for the period **April 1, 2014 to July 10, 2019**



WAYS TO SAVE: FIND TIPS AND PROGRAMS THAT HELP

Learn more at delmarva.com/WaysToSave

GWENDOLYN N SCOTT-JONES

Account number: 5500 3446 089

Your service address: 129 EAST ST
HARRINGTON DE 19952

Bill Issue date: Aug 7, 2019 - **REVISED BILL**

Summary of your charges

Balance from your last bill	\$672.62
Changes to your electric balance	\$227.71
Your payment(s) - thank you	\$492.00-
Balance forward as of Aug 7, 2019	\$408.33
New electric charges	\$19,299.99
Total amount due by Aug 28, 2019	\$19,708.32

A past due amount of \$180.62 remained on your account at the time your bill was prepared. If payment has been made, please disregard this notice. For bill payment options, visit www.delmarva.com.

This is a **REVISED BILL** based on a review of your account. If you have any questions, please call the Customer Service number listed in the "How to contact us" section of your bill.

Find helpful storm preparation and power outage information at delmarva.com

Learn how to save energy and money by registering for MyAccount at www.delmarva.com.

Your smart meter is read wirelessly. Visit My Account at delmarva.com to view your daily and hourly energy usage.

How to contact us

Customer service (Mon-Fri, 7am - 7pm)

TTY English

TTY Spanish

Electric emergencies & outages (24 hours)

¿Problemas con la factura?

Visit delmarva.com

1-800-375-7117

1-800-232-5460

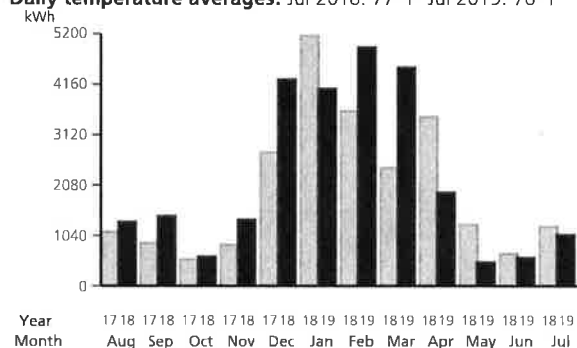
1-877-335-7595

1-800-898-8045

1-800-375-7117

Your monthly Electricity use in kWh

Daily temperature averages: Jul 2018: 77° F Jul 2019: 76° F



LB HD

Please tear on the dotted line below. Invoice Number: 210003086097 Page 1 of 4

Return this coupon with your payment
made payable to Delmarva Power

REVISED BILL

Account number

5500 3446 089

Total amount due by Aug 28, 2019

\$19,708.32

Checks Not Accepted

9DE00013

Amount
Paid:

\$

GWENDOLYN N SCOTT-JONES
129 EAST STREET
HARRINGTON DE 19952-3374



PO BOX 13609
PHILADELPHIA PA 19101



100001550034460890100000000408330000019299990000019708320014

GWENDOLYN N SCOTT-JONES

Account number: 5500 3446 089

Your electric bill for the period
April 1, 2014 to July 10, 2019**Details of your Electric Charges**Residential Heating - service number 0550 0344 6089 7000 5054 14
Electricity you used this period

<u>Meter Number</u>	<u>Energy Type</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
NXA107102735	Use (kWh)	Jul 10 <u>Reading</u> 331650	Jun 12 <u>Reading</u> 330593	29 <u>Multiplier</u> 1	1057

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period.
End and start date kWh meter readings are provided for informational purposes only.
Please visit My Account at delmarva.com to view your energy use data.

Your next bill period is scheduled to end on August 9, 2019**Peak Energy Savings Credit:** No Peak Savings Days were called during this billing period.

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 29 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Customer Charge		11.70
Distribution Charge	First 500 kWh X \$0.0321690 per kWh	16.08
Distribution Charge	Last 557 kWh X \$0.0321690 per kWh	17.92
Low Income Charge	1057 kWh X \$0.0000950 per kWh	0.10
Green Energy Fund	1057 kWh X \$0.0003560 per kWh	0.38
Renewable Compliance Charge:		
Wind & Solar	1057 kWh X \$0.0038080 per kWh	4.03
Qualified Fuel Cells	1057 kWh X \$0.0039670 per kWh	4.19
Distribution System Improvement Charge	at 0.94%	0.40
EDIT Credit 5 Year - KWH	1057 kWh X \$0.0009900- per kWh	1.05-
EDIT Credit 6 Year - KWH	1057 kWh X \$0.0017610- per kWh	1.86-
Total Electric Delivery Charges		51.89

Electric Summary

Balance from your last bill	\$672.62
Late Payment Charge	\$2.35
Other Receivables	\$225.36
Changes to electric balance	\$227.71
Payment Jun 25	\$492.00-
Total Payments	\$492.00-
Electric Charges (Residential Heating) Jul 2019	\$19,299.99
New electric charges	\$19,299.99
Total amount due by Aug 28, 2019	\$19,708.32

Electronic Check Conversion

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

GWENDOLYN N SCOTT-JONES**Account number: 5500 3446 089**Your electric bill for the period
April 1, 2014 to July 10, 2019

Both the "Wind & Solar" and "Qualified Fuel Cell" portions of the Renewable Compliance Charge above provide compliance required by Delaware's Renewable Energy Portfolio Standards Act. The Qualified Fuel Cells provide customers with approximately 39% of that compliance annually. For more on renewable and clean energy, visit delmarva.com/repesa.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. The class average annual price to compare is 6.46 cents per kWh.

Billing Period: Jun 12, 2019 to Jul 10, 2019 (29 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Capacity Charge	4.22 kW X \$3.7050540 per kW	15.64
Standard Offer Service Charge	First 500 kWh X \$0.0575930 per kWh	28.80
Standard Offer Service Charge	Last 557 kWh X \$0.0575930 per kWh	32.08
Total Electric Supply Charges		76.52
Total Electric Charges - Residential Heating		128.41

Residential Heating - service number 0550 0344 6089 7000 5054 14

Delivery Charges: These charges reflect the cost of bringing electricity to you. Current charges for 0 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Charge	152014 kWh X \$0.0529992 per kWh	8,056.62
Low Income Charge	152014 kWh X \$0.0000950 per kWh	14.44
Green Energy Fund	152014 kWh X \$0.0003560 per kWh	54.12
Renewable Compliance Charge:		
Wind & Solar	152014 kWh X \$0.0038080 per kWh	578.87
Qualified Fuel Cells	152014 kWh X \$0.0039630 per kWh	603.04
EDIT Credit 5 Year - KWH	152014 kWh X \$0.0009900- per kWh	150.49-
EDIT Credit 6 Year - KWH	152014 kWh X \$0.0017610- per kWh	267.70-
Total Electric Delivery Charges		8,888.90

Both the "Wind & Solar" and "Qualified Fuel Cell" portions of the Renewable Compliance Charge above provide compliance required by Delaware's Renewable Energy Portfolio Standards Act. The Qualified Fuel Cells provide customers with approximately 39% of that compliance annually. For more on renewable and clean energy, visit delmarva.com/repesa.

Supply Charges: These charges reflect the cost of producing electricity for you.

Billing Period: Apr 1, 2014 to Jul 10, 2019 (1927 days)**Billing Period: Jun 12, 2019 to Jul 10, 2019 (29 days)**

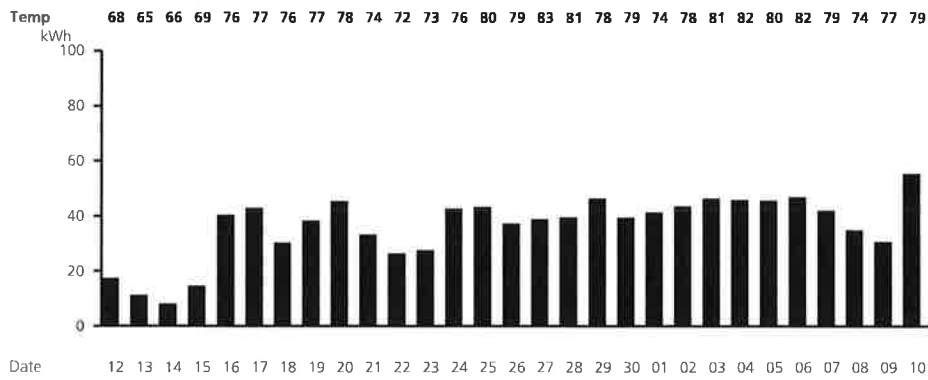
<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Standard Offer Service Charge	152014 kWh X \$0.0676430 per kWh	10,282.68
Total Electric Supply Charges		10,282.68
Total Electric Charges - Residential Heating		19,171.58

GWENDOLYN N SCOTT-JONES
Account number: 5500 3446 089

Your electric bill for the period
April 1, 2014 to July 10, 2019

Your daily electricity use for this bill period. Visit My Account at delmarva.com to see your hourly electricity use.
For Current Bill Month

Meter Number NXA107102735





An Exelon Company

August 7, 2019

GWENDOLYN SCOTT-JONES
129 EAST ST
HARRINGTON, DE 19952

RE: Account No. 055003446089

Dear Ms. Scott-Jones:

Our Revenue Protection investigator found the electric meter had been tampered with.

An adjustment has been prepared which covers from April 1, 2014 to July 10, 2019 based on the average cost per day. The net result of this adjustment is a debit to your account in the amount of \$19171.58. Additionally, you have been billed \$225.36 for the cost of the investigation. The total charges are \$19396.94.

If you need payment arrangements, please contact our Customer Care Call Center toll free at 800-375-7117.

Sincerely,

L. L. Lane

Sr. Billing Research & Investigation Specialist